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Attorneys for State Defendants
Hormann, Krings, Riddle, Wilcox and Oregon State Police

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,

Plaintiff,

v.

OREGON STATE POLICED ZAVALA,
ESTATE OF DAVID E. HALL, VIDOCQ
SOCIETY, CITY OF COQUILLE, CITY OF
COOS BAY, and COOS COUNTY,

Defendant.

Case No. 6:20-cv-1163-MK (Lead Case)
3:21-cv-1719-MK (Trailing Case)

DECLARATION OF JESSE B. DAVIS

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian ad litem, on behalf
of S.M., a minor,

Plaintiff,

v.

OREGON STATE POLICE,

Defendant.

I, Jesse B. Davis, hereby declare:

1. I am an attorney licensed to practice law in the State of Oregon and admitted to practice before the United States District Court for the District of Oregon. I am employed as a Senior Assistant Attorney General with the Oregon Department of Justice; and I am one of attorneys of record for Defendants Susan Hormann, Mary Krings, John Riddle, Kathy Wilcox and Oregon State Police (collectively referred to as “State Defendants”) in the above-captioned case.

2. I make this declaration in support of State Defendants’ Unopposed Motion for Extension of Time to Answer Second and First Amended Complaints.

3. The current deadline to file answers for plaintiffs’ Second Amended Complaint for Damages (#143) and First Amended Complaint for Damages (#144) is **February 10, 2023**.

4. State Defendants respectfully request the deadline for **all defendants** to file answers for plaintiffs’ Second Amended Complaint for Damages (#143) and First Amended Complaint for Damages (#144) be extended up to and including **March 13, 2023**. This is the first request for extension of this deadline.

5. I have conferred with plaintiffs’ counsel on this extension of time request. The parties are in agreement with the proposed extension.

6. Additional time is necessary to prepare answers the Amended Complaints due to their length and factual complexity.

7. This request is made in good faith and not for the purposes of unnecessary delay.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on February 10, 2023.

s/ Jesse B. Davis

JESSE B. DAVIS

Senior Assistant Attorney General
Oregon Department of Justice

CERTIFICATE OF SERVICE

I certify that on February 10, 2023, I served the foregoing DECLARATION OF JESSE B. DAVIS upon the parties hereto by the method indicated below, and addressed to the following:

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